

**Federal Defenders
OF NEW YORK, INC.**

Southern District
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Southern District of New York
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MEMO ENDORSED

February 21, 2020

VIA ECF

The Honorable Richard M. Berman
United States District Judge
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, NY 10007

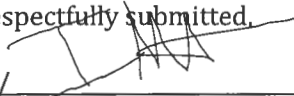
RE: United States v. Mitchell McPhee
19 Cr. 745 (RMB)

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: 2/21/2020
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Dear Judge Berman:

I write with the consent of the Government—to respectfully request that the Court temporarily modify Mr. McPhee's bail conditions to permit him to travel to Hamden, Connecticut on Saturday, February 22, 2020, and return to New York City the same day to continue to help his Uncle with his move. On September 25, 2019, Magistrate Judge Robert W. Lehrburger set the following bail conditions, *inter alia*: A \$50,000 personal recognizance bond secured by two financially responsible persons; travel limited to SDNY/EDNY; surrender of travel documents and no new applications; pretrial supervision as directed; curfew with electronic monitoring; and defendant to continue or seek employment. Mr. McPhee has been fully compliant with his bail conditions.

Mr. McPhee's uncle is still in the process of moving to Hamden, Connecticut, and he would like to pay Mitchell to continue to help with the move. With the Court's permission, Mr. McPhee would depart from New York at 9AM on Saturday, February 22, and return from Connecticut by 9PM the same day. Thank you for your consideration of this matter.

Respectfully submitted,

/s/
Ian Marcus Amelkin
Assistant Federal Defender
(212) 417-8733

Granted.
On Consent.

SO ORDERED:

HONORABLE RICHARD M. BERMAN
UNITED STATES DISTRICT JUDGE
2/21/2020